

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGONIn Re: STEVEN J. RUDOLF,

Debtor.

Case No. 15-30534-PCM13

OBJECTION TO CONFIRMATION AND MOTION TO
DISMISS

The United States of America, a creditor herein, acting by and through its undersigned counsel, objects to confirmation of the debtors' plan and moves the court for an order dismissing this case, for the following reasons:

1. The Internal Revenue Service (IRS) has searched its records and found no record of the filing of certain returns, as follows:

Year/Period	Form/Type of Tax
2009	1040
2012	1040
2013	1040

2. All returns required for pre-petition periods must be filed prior to plan confirmation. The United States objects to confirmation of the plan until the required returns are filed, and for at least 30 days thereafter, so the IRS may properly determine the amount and status of any tax claims and whether the plan provides proper treatment. All returns should be sent to:

Internal Revenue Service
M/S O240
1220 SW Third Ave, Suite G-044
Portland, Oregon 97204-2871

Dated: 03/03/15

/s/ Kathleen L. Bickers
KATHLEEN L. BICKERS, OSB # 85151
Assistant United States Attorney
1000 SW 3rd Ave., Ste. 600
Portland, Oregon 97204
Tel. No. (503) 727-1060

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN THAT the hearing on the above objection and motion will be held at the confirmation hearing scheduled by the court.

Dated: 03/03/15

/s/ Kathleen L. Bickers
KATHLEEN L. BICKERS, OSB # 85151
Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing OBJECTION TO CONFIRMATION AND MOTION TO DISMISS was made on 03/03/15, by mailing a true copy addressed to the following, except those designated as receiving ECF notice, who will be served electronically by ECF:

Recovery Management Systems Corp., Creditor
Cara J. Richter, Attorney for Creditor JPMorgan Chase Bank, N.A.
Karen M. Oakes, Attorney for Debtor
Wayne Godare, Trustee
US Trustee, Portland

ECF Only
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Dated: 03/03/15

/s/ Kathleen L. Bickers
KATHLEEN L. BICKERS, OSB # 85151
Assistant United States Attorney